

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

In re: Lindell Management LLC Litigation

Case No. 23-cv-1433
(JRT/DJF)

**DECLARATION OF
CARY JOSHI**

I, Cary Joshi, pursuant to 28 U.S.C. § 1746, declare as follows:

1. I am an attorney with Bailey & Glasser LLP. I am over the age of 18 and make this declaration upon my personal knowledge.
2. Lindell Management LLC has not paid the judgment entered by the Court on February 22, 2024 (ECF 46).
3. On February 22, 2024, Mr. Zeidman served post-judgment discovery requests on Lindell. (Interrogatories and Requests for Production attached as Exhibits A and B).
4. On August 23, 2024 Lindell provided written responses to the requests for production of documents as well as an amended response to Interrogatory 7. (Responses to Requests for Production of Documents and Amended Interrogatory No. 7 attached as Exhibits C and D).
5. After corresponding with counsel for Lindell and being told that Lindell would cooperate on the technical issues related to the QuickBooks documents, I informed

the court that we would not need a hearing on the second motion to dismiss. (Correspondence with T. Miller attached as Exhibit E, pp. 8-13).

6. On August 26, 2024, I contacted counsel for Lindell asking that certain technical issues be resolved related to Lindell's production of QuickBooks files in native format. (See Exhibit E, pp. 8-13).

7. To expedite access to QuickBooks native files produced by Lindell, I purchased a trial version of QuickBooks.

8. It was not possible to review the files because they were password protected and it appears that only Lindell Management LLC has the password. (Exhibit E, pp. 2-4).

9. I continued to communicate with Mr. Miller by email regarding our inability to access the native QuickBooks files. (Exhibit E, pp. 1-2).

10. Counsel for Lindell has not responded to requests to meet and confer since September 30, 2024. (Exhibit E, p. 1).

11. On, September 16, 2024, in connection with Lindell's amended response to Interrogatory No. 7, I sent a letter to Lindell requesting documents be produced in response to Document Request No. 5, which asked for documents related to any debts owed or incurred by Lindell Management, LLC. (Letter to T. Miller dated September 6, 2024, attached as Exhibit F; see also Exhibits C and D).

12. Counsel for Lindell has never responded to this letter or the request for documents responsive to Request No. 5 or provided a verification for amended Interrogatory No. 7. (Exhibit E, p. 1).

13. I declare under penalty of perjury that pursuant to the laws of the United States of America that the foregoing is true and correct.

DATED: December 9, 2024

BAILEY & GLASSER LLP

/s/ Cary Joshi

Cary Joshi

Attorney for Petitioner Robert Zeidman